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11 Attorneys for Plaintiff and Counter-Defendant
GSI Technology, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

16 GSI TECHNOLOGY, INC., a Delaware Corporation,

17 Plaintiff and Counter-Defendant,

18 || v.

19 UNITED MEMORIES, INC., a Colorado
20 Corporation, and INTEGRATED
SILICON SOLUTION, INC., a Delaware
Corporation.

Defendants and Counter-Claimants.

CASE NO. 13-CV-1081-PSG

**DECLARATION OF BROOKE KILLIAN
KIM IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT OF
DEFENDANT UNITED MEMORIES, INC.**

Complaint: Filed March 8, 2013

Courtroom: 5

Judge: Hon. Paul S. Grewal

Hearing Date: February 3, 2015

Hearing Time: 10:00 a.m.

1 I, Brooke Killian Kim, declare as follows:

2 1. I am an attorney at the law firm DLA Piper LLP (US) and counsel of record for
3 Plaintiff GSI Technology, Inc. (“GSI”) in the above-captioned action. I am a member in good
4 standing of the State Bar of California and have been admitted to practice law before this Court. I
5 have personal knowledge of the facts set forth in this Declaration, and if called as a witness, could
6 and would testify competently to such facts under oath.

7 2. I submit this declaration in support of GSI’s Opposition to Motion for Summary
8 Judgment of United Memories, Inc. (“UMI”).

9 3. Attached as Exhibit A to this declaration is a true and correct copy of the UMI-GSI
10 Product Design and Development Agreement 576 Mb Low Latency DRAM, produced in this
11 litigation with Bates numbering GSI0007481-97.

12 4. Attached as Exhibit B to this declaration are true and correct copies of excerpts
13 from the Deposition of David Chapman, taken in this matter on May 29, 2013.

14 5. Attached as Exhibit C to this declaration are true and correct copies of excerpts
15 from the Deposition of Ramaa Iyer, taken in this matter on May 21, 2013.

16 6. Attached as Exhibit D to this declaration is a true and correct copy of a document
17 produced by UMI in this litigation with Bates numbering UMI_0001784-85.

18 7. Attached as Exhibit E to this declaration is a true and correct copy of a document
19 produced by UMI in this litigation with Bates numbering UMI_0012116.

20 8. Attached as Exhibit F to this declaration is a true and correct copy of GSI
21 Technology, Inc.’s Supplemental Responses to Defendants United Memories, Inc. and Integrated
22 Silicon Solution, Inc.’s Request for Disclosure of Trade Secrets, served August 13, 2014;

23 9. Attached as Exhibit G to this declaration is a true and correct copy of a document
24 produced by UMI in this litigation with Bates numbering UMI_0001159-80.

25 10. Attached as Exhibit H to this declaration is a true and correct copy of a document
26 produced by GSI in this litigation with Bates numbering GSI10350317.

27 11. Attached as Exhibit I to this declaration are true and correct copies of excerpts
28 from the Deposition of Didier Lasserre, taken in this matter on May 31, 2013.

1 12. Attached as Exhibit J to this declaration are true and correct copies of excerpts
2 from the Deposition of Lee-Lean Shu, taken in this matter on May 24, 2013.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Date: January 13, 2015

/s/ Brooke Killian Kim
BROOKE KILLIAN KIM

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